

REMARKS

Claims 1 – 3 are pending and under consideration in the above-identified application, and Claims 4 – 6 were previously cancelled.

In the Final Office Action, Claims 1 – 3 were rejected.

In this Amendment, Claim 1 is amended. No new matter has been introduced as a result of this Amendment.

Accordingly, Claims 1 – 3 remain at issue.

I. Interview Summary

Applicants thank the Examiner for the courtesy extended during a telephone conference held on Monday May 5, 2008 with Applicant's agent, Kader Gacem.

During the interview, Applicants' agent noted that the limitation "a chemical liquid supply unit which can supply a chemical liquid polish onto said polishing pad as said electropolishing liquid onto a substantially central portion of said polishing pad" can be made distinguishable from the cited reference to Talieh if amended to include the word "axial" in the "substantially central portion" phrasing.

In response, the Examiner agreed that Talieh discloses that the chemical supply unit (44) is capable of supplying a chemical liquid onto a substantially central position (central region of an inner annular edge and an outer annular edge of the polishing pad, for example halfway between these two edges), but not onto a substantially central axial portion of the polishing pad.

Accordingly, Applicants have amended Claim 1 as discussed above in order to overcome the claim rejection and to put the present application in condition for allowance.

II. 35 U.S.C. § 102 Anticipation Rejection of Claim 1

Claim 1 was rejected under 35 U.S.C. § 102(b) as being anticipated by *Talieh* (U.S. Patent No. 6,176,992). Although Applicants respectfully traverse this rejection, Claim 1 has been amended to clarify the invention and remove any ambiguities that may have been at the basis of this claim rejection.

Claim 1 is directed to an electropolishing apparatus. The electropolishing apparatus comprises a polishing surface plate including a cathode, a polishing pad disposed on the polishing surface plate, a substrate holding unit which holds a work substrate, an outer

circumferential portion of the work surface disposed outside of the polishing surface of the polishing pad, an anode to be brought into contact with the work surface, a chemical liquid supply unit which supplies the chemical liquid polish, and a power source for supplying electric power.

As stated above in the Interview Summary section, Claim 1 recites that a chemical liquid supply unit which supplies a chemical liquid polish onto the polishing pad onto a substantially axial central portion of the polishing pad.

This is clearly unlike *Talieh*. In fact, *Talieh* teaches and illustrates in at least FIGs. 1A and 1B, that an In-Channel 34 dispenses the chemical liquid from below the polishing pad 32 and another In-Channel 44 dispenses the chemical liquid simultaneously onto an available radial surface of the polishing pad 32. As illustrated and shown, the In-Channel 44 does not dispense the chemical liquid at a substantially central axial portion of the polishing pad 32, as required by Claim 1.

For at least this reason, *Talieh* fails to teach or suggest all of the limitations of Claim 1. Thus, Claim 1 is patentable over *Talieh*.

Accordingly, Applicants respectfully request that this claim rejection be withdrawn.

III. 35 U.S.C. § 103 Obviousness Rejection of Claims 2

Claim 2 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Talieh* in regards to claim 1 as stated above, in view of *Duboust et al.* ("*Duboust*") (U.S. Publication No. 2003/0116446), further in view of *Chang et al.* ("*Chang*") (U.S. Patent No. 6,206,760), and further in view of *Kondo et al.* ("*Kondo*") (U.S. Publication No. 2002/0061722). Applicants respectfully traverse this rejection.

Claim 2 is dependent on Claim 1, shown above to be patentable over *Talieh*. Moreover, in addition to *Talieh*, each one of the three references, *Duboust*, *Chang* and *Kondo*, also fails to teach or suggest that a chemical liquid supply unit for supplying a chemical liquid polish onto the

polishing pad onto a substantially central axial portion of the polishing pad. As such, *Talieh*, *Duboust*, *Chang* and *Kondo* may not be properly combined to reject Claim 1.

Thus, Claim 1 is patentable over *Talieh*, *Duboust*, *Chang* and *Kondo*, taken singly or in combination, as is dependent Claim 2, for at least the same reasons.

Accordingly, Applicants respectfully request that these 35 U.S.C. § 103 claim rejections be withdrawn.

IV. 35 U.S.C. § 103 Obviousness Rejection of Claim 3

Claim 3 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Talieh* regards to claim 1 as stated above, in view of *Duboust*.

Claim 3 is dependent on Claim 1, shown above to be patentable over *Talieh*, *Duboust*, *Chang* and *Kondo*. Thus, Claim 1 is patentable over *Talieh* and *Duboust*, taken singly or in combination, as is dependent Claim 3, for at least the same reasons.

Accordingly, Applicants respectfully request that these 35 U.S.C. § 103 claim rejections be withdrawn.

V. Conclusion

In view of the above amendments and remarks, Applicant submits that all claims are clearly allowable over the cited prior art, and respectfully requests early and favorable notification to that effect.

Dated: May 7, 2008

By: David R. Metzger

Respectfully submitted,

David R. Metzger
Registration No. 32,919
SONNENSCHN NATH & ROSENTHAL LLP
P.O. Box 061080
Wacker Drive Station, Sears Tower
Chicago, Illinois 60606-1080
(312) 876-8000